

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

OMAR SANTIAGO-MIRANDA, #21825-069

v.

Crim. No: 3:04-cr-00414-PAD

UNITED STATES OF AMERICA,  
Respondent.

PRO SE PETITIONER'S MOTION TO SUPPLEMENT HIS  
MOTION FOR 'COMPASSIONATE RELEASE' AND/OR A MODIFICATION  
OF SENTENCE PURSUANT TO 18 U.S.C. & 3582(c)(1)(A) AND  
U.S.S.G. AMENDMENT #814 AND TO TO LIFT THE STAY ISSUED FOR  
THE SOLE PURPOSE OF OBTAINING MEDICAL RECORDS

NOW COMES, the petitioner, appearing pro se in the above matter,  
respectfully requesting that the Honorable Court grant this, his  
Motion to Supplement his Motion for 'Compassionate Release' and to  
Lift the Stay in the above matter, and would show the Court as follows:

RELEVANT BACKGROUND

The petitioner was originally indicted and convicted by a plea  
of guilty in the United States District of Puerto Rico for violations  
of 21 U.S.C. & 841 and & 846.

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ISSUE I.

WHETHER THE PETITIONER CAN SUPPLEMENT HIS MOTION FOR "COMPASSIONATE RELEASE" CLAIM BASED UPON HIS NEED TO BE A CARETAKER FOR HIS MOTHER DUE TO HER DEBILITATING MEDICAL CONDITION?

The petitioner simply contends that in addition to his own issues supporting his petition for a 'compassionate release', he needs to become a caretaker for his mother whose medical conditions prevent her from caring for herself properly and performing basic tasks. See Ex. 1 (MEDICAL RECORDS FOR RAMONITA-MIRANDA)

The petitioner further contends that this request meets the "FAMILY CIRCUMSTANCES" provision of & 181.13 and & 18 U.S.C. 18 U.S.C. & 3582(c)(2)(A). The petitioner's mother has pancreatitis and pancreatic insufficiency, i.e., pancreatic cancer primarily and breathing/respiratory issues such as bronchial asthma, in addition to other medical issues.

WHEREFORE, for all of the above reasons and in the interest of justice and fairness, the petitioner respectfully request that the Honorable Court grant his Motion to Supplement his Motion for a Compassionate Release.

Respectfully,

Date: 02/22/2024

  
Omar Santiago-Miranda

CERTIFICATE OF SERVICE

I, OMAR SANTIAGO-MIRANDA, hereby solemnly swear that I have mailed a copy of this document and attachments via U.S. Mail and pursuant to the penalties of perjury to the OFFICE OF THE U.S. ATTORNEY FOR THE DISTRICT OF PUERTO RICO ON 02/22/2024..

